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Office of the Secretary  
Federal Communications Commission  
Washington, DC 20554

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COMMENTS IN THE MATTER OF:

Amendments to the amateur service rules	)	
including amendments for examination credit,	)	WT 95-57
eligibility for a club station license,	)	
recognition of the volunteer examiner session	)	RM-8301
manager, a special event call sign system, and	)	RM-8418
and self-assigned indicator in the station	)	RM-8462
identification.	)	

To the Commission:

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I. INTRODUCTION

I have been licensed in the Amateur Radio Service continuously since September 17, 1956, and hold amateur call sign K4KY0. I am a Life Member of both the American Radio Relay League (ARRL) and the Quarter Century Wireless Association (QCWA) with respective memberships in those two organizations for more than thirty eight (38) and thirteen (13) years and currently hold elected office in a local chapter of the latter. My comments come from my perspective of those thirty-nine years' experience and are motivated by my heartfelt desire to preserve and protect the Service's long-standing traditions of public service and enhanced communications expertise.

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## II. EXAMINATION CREDIT

In petition RM-8418, the ARRL stated that it's purpose in was to encourage former amateur operators to become involved again in the technical self-training and public service communications opportunities provided by the amateur service. While I feel it is imperative to rebuild the amateur radio body's dramatically declining technical expertise, this is not the way. Further, the true effect this proposed amendment will eclipse its stated purpose.

1. The growth of the "state-of-the art" in communications and the myriad amateur rule changes reflected in the content of the current amateur examination question pools bears little resemblance to those administered a few years ago. I therefore do not believe it would be appropriate to award credit for past examination elements. Ironically, assuming that lapsed amateurs have the desire to return to the hobby and have kept abreast of advancing technology and rule amendments, they are likely to have little difficulty regualifying without special exemption.
2. Allowing past examination element credit would effectively eliminate the license renewal grace period [§97.19(c)] and essentially creates a lifetime amateur radio license. Allowing such a major licensing structure revision should be addressed specifically with ample opportunity for all to proffer comments rather than allowing it to take effect collaterally under the guise of a "feel-good" amendment that openly suggests only that it invites lapsed licensees back into amateur radio.

3. Renewing an amateur radio license is required only every ten years and consists of completing FCC Form 610 with seven simple personal identification items, checking block 4F requesting renewal, and affixing a signature. The entire process, including addressing and stamping the envelope, should take no longer than five minutes.

Particularly considering that renewal oversight has been virtually eliminated by automatic reminders, I believe that any reasonable and prudent person would agree that anyone not doing so has lost interest in amateur radio and it is unlikely that they will make the effort to return. Amending the rules to set up a new system to serve those few who might be somehow induced to do so is simply not justified, particularly at a time when the Commission's funding is being curtailed.

I vehemently oppose adopting this amendment. Addressing the stated intent, lapsed amateur licensees who have not renewed within the two year grace period will probably never do so, but even if they do it is not likely that they will have maintained an acceptable level of expertise. More importantly, I oppose this amendment as it camouflages creating a permanent amateur license, an issue that should be addressed directly, if it should be addressed at all.

### III. CLUB ELIGIBILITY

The ARRL has requested in Petition RM-8462 that the minimum number of club members required for a club station to be eligible for a license be increased from two to four. While the spirit of the League's request certainly has merit and may give the appearance of being effective in reducing the numbers of persons capriciously pursuing additional call signs, its adoption as stated will in truth have a negligible effect. If an individual wishes to capriciously apply for a club license, soliciting two additional "members" requires very little additional effort.

As an alternative method of minimizing frivolously conceived club license applications, I suggest that §97.19 be amended to require submitting a copy of the club's bylaws and a statement by a club officer certifying that the application is being made on behalf of a bona fide amateur radio club with a membership in excess of ten (10) persons.

### IV. VE SESSION MANAGER

I have never favored allowing examinations being administered by the private sector because of the increased potential for fraud similar to the recent highly publicized episodes in California. I therefore favor adopting this amendment proposed in RM-83011 as it would appear that doing so may slightly enhance the VEC system's integrity.

## V. SPECIAL EVENT VANITY CALL SIGN SYSTEM

I very much favor issuing special call signs for significant events, particularly those where attention will be attracted to the amateur radio's contributions to public service. I therefore heartily support the spirit of the special event vanity call sign system amendment, but strongly suggest the following enhancements:

1. Special event vanity call signs should be granted in other than just the 1x1 format. Any other requested unassigned call sign in virtually any legally permissible combination deemed reasonable on a case-by-case basis should also be allowed.
2. The special event vanity call sign should generally be allowed for a period encompassing the special event, or for thirty (30) days, whichever is the shorter period. Extending the proposed fifteen (15) day term will afford greater flexibility and will provide for longer events.
3. Provision should be made for a semi-permanent special event vanity call signs. Examples include those used for established museum amateur radio displays similar to the Smithsonian Institution's former NN3SI exhibit or other bonafide extended special events such as a World's Fairs. These need not be in the 1x1 format.

4. Events that are "of special significance to the amateur service community" is very much open to interpretation. Acceptable circumstances should be clearly defined in Part 97 to ensure that special event vanity call sign system does not become abused to the point that it detracts from truly significant events.
5. Once issued, the special event call sign should not be reissued for a minimum of six months (preferably a year) after its expiration. This would be necessary to prevent confusion between special event stations.

#### VI. SELF-ASSIGNED INDICATOR

Allowing indicators to be included before, after, or both before and after, the assigned call sign will provide the amateur service community with greater flexibility when making the station identification announcement. I support adoption of this amendment.

Respectfully submitted:

A handwritten signature in black ink, appearing to read 'Richard A. Stalls', written in a cursive style.

Richard A. Stalls, K4KY0